

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

COMPLAINT OF THE NATIONAL  
ASSOCIATION OF POSTMASTERS OF  
THE UNITED STATES, THE LEAGUE OF  
POSTMASTERS, MARK STRONG,  
ROBERT RAPOZA, MARILYN SHAW,  
AND MARILYN HILL

Docket No. C2011-3

June 15, 2011

**Motion to Extend Time to Respond to  
the United States Postal Service Motion to Dismiss**

Pursuant to Rule 3001.16, the above-referenced Complainants, ("Complainants") submit this Motion to Extend Time to respond to the Postal Service's Motion to Dismiss. Complainants request an extension of time of three weeks, to July 5, 2011.

In support of their Motion to Extend Time, the Complainants state as follows:

1. Rule 3001.21(b) gives Complainants seven days to respond to the Postal Service's Motion to Dismiss. The Postal Service's Motion is lengthy and complex. Although Complainants have anticipated some of the Postal Service's arguments in their Complaint, other arguments require research and analysis which cannot be reasonably accomplished in seven days. This is particularly true because both counsel for the Complainants have been and will be out of town (indeed one has been out of the country) for most of the seven-day period allowed by Rule 3001.21(b).

2. This Motion to Extend Time is timely, as Complainants are filing within two days of the Postal Service's Motion to Dismiss, and well before the seven-day deadline has expired.

3. Granting this extension of time will not unduly prejudice any interests.

4. Complainants have discussed this matter with the Postal Service's

attorneys and they responded with the following stipulations:

We do not oppose complainants' request for a 3 week extension, beginning 6/13/2011, to respond to our motion to dismiss (MTD) filed yesterday in PRC Docket NO. C2011-3, subject to the following:

- 1) if complainants make a representation concerning our position in the body of the motion, we would like the opportunity to approve it first before it is filed.
- 2) Complainants agree not to file any other pleadings in the docket (other than a motion to withdraw the complaint) until such time as a response to the MTD is filed, except as otherwise ordered by the PRC.

Counsel for the Complainants are uncertain whether they understand the Postal Service's stipulations, but to the extent that we do understand them, we do not agree.

Respectfully submitted this 15<sup>th</sup> day of June, 2011.

/s/ Michelle Bushman for Harold Hughes

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*Counsel for the National League of Postmasters,  
the National Association of Postmasters of the  
United States, and the individual Complainants.*

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Motion to Extend Time has been served on the United States Postal Service at the following address on this 15<sup>th</sup> day of June, 2011:

United States Postal Service  
[PRCCOMPLAINTS@usps.gov](mailto:PRCCOMPLAINTS@usps.gov)

/s/ Michelle Bushman  
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